

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHER DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

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| IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION | Master File No. 2:12-MD-02327 MDL No. 2327 |
| THIS DOCUMENT RELATES TO: THE WAVE 4 CASES LISTED IN DEFENDANTS' EXHIBIT A | JOSEPH R. GOODWIN U.S. DISTRICT JUDGE |

**PLAINTIFFS' RESPONSE TO ETHICON'S MOTION TO EXCLUDE THE
GENERAL OPINIONS AND TESTIMONY OF WILLIAM PORTER, M.D.**

Plaintiffs submit the following Memorandum of Law in Opposition to the “Motion to Exclude the General Opinions and Testimony of William Porter, M.D.” On April 13, 2017, Ethicon filed a “Motion” to exclude Dr. Porter (Dkt. No. 3636), but failed to submit an accompanying “Memorandum of Law” detailing any asserted grounds or bases for exclusion. As such, Ethicon has provided no argument—and cited and authorities—supporting its Motion to bar Dr. Porter’s opinions and testimony. Plaintiffs respectfully request that the Court deny Ethicon’s Motion to Exclude William Porter, M.D.

Dated: April 27, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Edward A. Wallace